



AML/CFT SUMMARY STATEMENT

31 July 2025

Austral Capital Limited
(trading as PE Projects)

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AML/CFT Summary Statement

Effective Date: 31 July 2025

Our Commitment

PE Projects is the trading name of Austral Capital Limited (“PE Projects”, “Austral”). We are committed to protecting the integrity of the global financial system by identifying, mitigating, and reporting risks associated with money laundering, terrorism financing, fraud, and other financial crimes.

This AML/CFT Summary Statement outlines our core principles and practices as governed by our full AML/CFT Compliance Programme.

Regulatory Framework

Austral Capital complies with the **Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act)** of New Zealand, as well as relevant international guidelines issued by the **Financial Action Task Force (FATF)**.

- Registered on the **New Zealand Financial Service Providers Register (FSPR)**
- Reporting entity subject to AML/CFT oversight
- Implements globally recognised risk-based controls for offshore operations

Customer Due Diligence (CDD)

Before establishing a client relationship, we perform the following:

- Identity verification using secure tools (e.g. SumSub) and certified documents
- Source of funds and source of wealth verification where required
- Sanctions screening, PEP identification, and adverse media checks
- Client classification and risk rating (Standard, Simplified, Enhanced)
- Collection of jurisdictional declarations and reverse solicitation confirmation (for offshore retail clients)

Ongoing Monitoring

We maintain a risk-based monitoring system to:

- Track transactional behaviour and detect anomalies
- Identify unusual activity or inconsistent patterns
- Flag high-risk trades for manual review and escalation

Monitoring is conducted using a combination of automated tools and human oversight.

Suspicious Activity Reporting

- Internal escalation procedures are in place to investigate red flags
- Where appropriate, Suspicious Activity Reports (SARs) are submitted to the **New Zealand Financial Intelligence Unit (FIU)**
- Staff are trained to recognise and report suspicious conduct

Recordkeeping

In accordance with AML/CFT Act obligations:

- All client identification records, transaction logs, and audit trails are retained for a **minimum of 7 years**
- Records are stored securely in encrypted digital formats and accessible for audit or regulatory review

Governance and Training

- Austral has appointed a qualified **AML Compliance Officer** who reports to senior management
- All staff undergo **annual AML/CFT training** to remain informed about evolving risks, red flags, and reporting duties

International Risk Controls

Given PE Project's offshore client base, we: - Apply **enhanced due diligence (EDD)** for clients from high-risk jurisdictions - Restrict onboarding from sanctioned or prohibited countries - Enforce **non-solicitation and jurisdictional controls** to limit exposure to foreign regulatory regimes

Contact and Reporting

To learn more about our AML/CFT programme or to report a compliance concern, contact:

PE Projects (Austral Capital Limited)

Email: compliance@pe-projects.com

Website: www.pe-projects.com